

SEP 2 2016

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

David J. Bradley, Clerk of Court

United States of America )

v. )

Ilyass BENLAMKADDEM )

Case No. H16-1283M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2, 2016 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 2252A (a)(1)

Transportation of child pornography

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Juanae Johnson, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: September 2, 2016

Judge's signature

City and state: Houston, Texas

Stephen Wm. Smith, US Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Juanae J. Johnson, being duly sworn, depose and state:

1. I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI) assigned to the Houston, Texas office. I have been so employed since August of 2004. As part of my daily duties as an HSI agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251(d)(2)(B), 2252 and 2252A, as well as Title 18 U.S.C. § 2423(b), travel with the intent to engage in illicit sexual conduct. I have received specialized training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of numerous search warrants most of which involved child exploitation and/or child pornography offenses. This Affidavit is made in support of a criminal complaint charging Ilyass BENLAMKADDEM with a violation of Title 18 U.S.C. 2252A (a)(1), the transportation of child pornography.
2. I am familiar with the information contained in this affidavit based upon the investigation I have conducted and based on my conversations with other law enforcement officers who have engaged in numerous investigations involving child sexual exploitation.
3. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause to believe that evidence of violation of Title 18 U.S.C. § 2252A have been committed by Ilyass BENLAMKADDEM.
4. On September 1, 2016, Ilyass BENLAMKADDEM, a citizen of Belgium,

arrived at George Bush Intercontinental Airport in Houston, Texas on British Airlines flight number 195 from Brussels, Belgium. As BENLAMKADDEM applied for entry into the United States he was questioned by United States Customs and Border Protection (CBP) regarding his reason for travel into the United States. BENLAMKADDEM told the officers that he was headed to Kingsville, TX to visit colleges. BENLAMKADDEM was then referred for a secondary inspection where a border search was conducted of his personal belongings and electronic devices.

5. BENLAMKADDEM was interviewed by CBP officers at which point he told them that he traveled to the United States to visit a minor female victim who was 16 years of age whom he had been talking with for approximately 3 years. During the border search officers identified several images which they perceived to be child pornography.
6. CBP officers contacted Homeland Security Investigations airport duty agent Therese Renick to refer the case. Special Agent Renick contacted HSI Cyber Investigations Group Special Agent Juanae Johnson.
7. Special Agent Juanae Johnson conducted an interview of BENLAMKADDEM with CBP Officer Rutledge. SA Johnson asked BENLAMKADDEM the reason for his travel into the United States. He stated that he wanted to come to the United States to find out the process of how to get into college here in the United States. He also stated that he was coming to visit some friends in Kingsville, TX. After arriving in Houston he planned to travel to Kingsville.
8. SA Johnson asked about the friends he had in Kingsville, at which point he identified Minor Victim 1. He identified her as a "girl" he met online and has been talking to her for approximately two or three years. He stated they currently utilize Facebook to communicate with one another.
9. At approximately 10:00 pm, BENLAMKADDEM was read his Miranda Rights. SA Johnson informed him that she needed to ask him more questions but before doing so she wanted him to understand his rights.

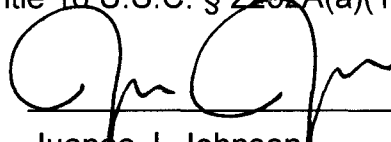
BENLAMKADDEM stated that he understood his rights and he signed the waiver.

10. During the interview, BENLAMKADDEM stated that he and Minor Victim 1 would "tease" one another, which he explained was exchanging "nudes" (nude images of one another). He sent nude images of his penis and she sent images of her vagina on more than one occasion during the course of their relationship. BENLAMKADDEM stated that he and Minor Victim 1 would video chat via Facebook Messenger and would masturbate together online. He further stated that this has happened on several occasions. SA Johnson showed BENLAMKADDEM his phone and the images that were located within the gallery. The images are described below.

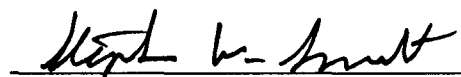
- a. Image 1: (dated 09/07/2015 depicts a minor female victim approximately 14-16 years of age, taking a fully nude selfie. The image appears to be taken with a cell phone and she is pictured with what appears to be pink headphone wires. It appears that an image of BENLAMKADDEM is located on the top right hand corner of the image. This indicates that it is a screenshot of a video chat conversation.
- b. Image 2: (dated 08/22/2015) depicts a close up of a vagina. Also located on the upper left hand of the photo is a picture of BENLAMKADDEM. BENLAMKADDEM informed SA Johnson that this image was a screen shot of a video chat conversation where he and Minor Victim1 were masturbating with one another.
- c. Image 3: (dated 8/22/2015) depicts a close up image of the vagina of Minor Victim 1. Located on the bottom right hand corner of the image is a picture of BENLAMKADDEM, which indicated that this image was taken as a screenshot from a video chat conversation.

11. BENLAMKADDEM identified all the above images as being Minor Victim 1. BENLAMKADDEM admits that "if it wasn't illegal" he would want to have sex with Minor Victim 1. He knows and understands that it is illegal to exchange nude images with a minor.

12. BENLAMKADDEM provided SA Johnson with identifying information for Minor Victim1 to include her name, date of birth and address. SA Johnson contacted HSI Special Agent Eric Martinez in Corpus Christi, TX and provided him the above information.
13. On September 02, 2016, SA Martinez identified Minor Victim 1 at her residence. SA Martinez was able to confirm that Minor Victim 1 is 16 years of age, with a date of birth of March 1, 2000.
14. Based on the information delineated above, I respectfully request that the Court find probable cause and issue a Criminal Complaint charging Ilyass BENLAMKADDEM, with violations of Title 18 U.S.C. § 2252A(a)(1).

  
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Juanae J. Johnson  
Special Agent, HSI

Sworn to before me on September 2, 2016, at 4 p.m. CDT in Houston, TX and I find probable cause.

  
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Honorable Stephen Wm Smith  
United States Magistrate Judge